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 Ltd., Synta Canada Int'l Enterprises Ltd., SW Technology
 Corp., Olivon Manufacturing Co. Ltd., Olivon USA, LLC,
 Nantong Schmidt Optoelectrical Technology Co. Ltd, Pacific
 Telescope Corp., Corey Lee, David Shen, Sylvia Shen, Jack
 Chen, Jean Shen, Joseph Lupica, Dave Anderson, Laurence
 Huen

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

IN RE TELESCOPES ANTITRUST LITIGATION
 THIS DOCUMENT RELATES TO:

AURORA ASTRO PRODUCTS, LLC, PIONEER
 CYCLING & FITNESS, LLP; and those similarly
 situated,

Plaintiffs,

vs.

CELESTRON ACQUISITION, LLC, SUZHOU
 SYNTA OPTICAL TECHNOLOGY CO., LTD.,
 SYNTA CANADA INT'L ENTERPRISES LTD.,
 SW TECHNOLOGY CORP., OLIVON
 MANUFACTURING CO. LTD., OLIVON USA,
 LLC, NANTONG SCHMIDT OPTOELECTRICAL
 TECHNOLOGY CO. LTD., NINGBO SUNNY
 ELECTRONIC CO., LTD., PACIFIC TELESCOPE
 CORP., COREY LEE, DAVID SHEN, SYLVIA
 SHEN, JACK CHEN, JEAN SHEN, JOSEPH
 LUPICA, DAVE ANDERSON, LAURENCE
 HUEN, and DOES 1-50,

Defendants.

Case No. 5:20-cv-03642-EJD

*Assigned for All Purposes to:
 Hon. Edward J. Davila*

DECLARATION OF LAWRENCE J.H. LIU IN SUPPORT OF DEFENDANT SYNTA CANADA INT'L ENTERPRISES LTD.'S MOTION FOR SUMMARY JUDGMENT, OR IN THE ALTERNATIVE, PARTIAL SUMMARY JUDGMENT

*[Filed with Defendant Synta Canada Int'l
 Enterprises Ltd.'s Motion For Summary
 Judgment; Separate Statement; and Declaration
 of Sylvia Shen]*

Hearing

Date: TBD
 Time: TBD
 Crtrm.: 4 (5th Floor)

Compl. Filed: June 1, 2020
 Trial Setting Conference: May 8, 2025

Case No. 5:20-cv-03642-EJD

DECLARATION OF LAWRENCE J.H. LIU IN SUPPORT OF DEFENDANT SYNTA CANADA INT'L
 ENTERPRISES LTD.'S MOTION FOR SUMMARY JUDGMENT

DECLARATION OF LAWRENCE J.H. LIU

I, Lawrence J.H. Liu, declare as follows:

1. I am an attorney licensed to practice before this Court, and am Senior Counsel to the law firm of FROST LLP, attorneys of record herein for Defendants Celestron Acquisition, LLC, Synta Technology Corp., Suzhou Synta Optical Technology Co., Ltd., Synta Canada Int'l Enterprises Ltd., SW Technology Corp., Olivon Manufacturing Co. Ltd., Olivon USA, LLC, Nantong Schmidt Optoelectrical Technology Co. Ltd., Pacific Telescope Corp., Corey Lee, David Shen, Sylvia Shen, Jack Chen, Jean Shen, Joseph Lupica, Dave Anderson, Laurence Huen (collectively, "Defendants"). I have personal knowledge of the facts stated herein and, if called upon to testify as a witness, I could and would competently testify thereto. I make this Declaration in support of Defendant Synta Canada Int'l Enterprises, Ltd.'s Motion for Summary Judgment, Or In The Alternative, Partial Summary Judgment, filed concurrently herewith.

2. On February 28, 2025, my office met and conferred with counsel for Direct Purchaser Plaintiffs ("DPPs") to discuss Defendants' anticipated filing of motions for summary judgment for: (1) Corey Lee; (2) Jean Shen, Olivon Manufacturing Co. Ltd., and Olivon USA, LLC (together, "Olivon Defendants"); (3) Synta Technology Corp. ("Synta Taiwan"); (4) Synta Canada Int'l Enterprises Ltd. ("Synta Canada"); (5) SW Technology Corp. ("SW Technology"); (6) Pacific Telescope Corp. ("Pacific Telescope"); (7) Celestron Acquisition, LLC ("Celestron"); (8) Joe Lupica; and (9) Dave Anderson. Defendants explained the factual and legal grounds for each motion and invited DPPs to further meet and confer on how to potentially resolve any of the motions informally. The parties, however, were not able to resolve these motions before the Court's dispositive motion deadline, thereby necessitating the filing of these motions.

3. Attached hereto as **Exhibit A** are true and correct copies of excerpts taken from the transcript of Sylvia Shen's deposition in this case, volume I, dated March 4, 2024

4. Attached hereto as **Exhibit B** are true and correct copies of excerpts taken from the transcript of Sylvia Shen's deposition in this case, volume II, dated March 5, 2024.

5. Attached hereto as **Exhibit C** are true and correct copies of excerpts taken from the transcript of Sylvia Shen's deposition taken in her 30(b)(6) capacity on behalf of Synta Canada and

1 SW Technology in this case, dated March 27, 2024.

2 6. Attached hereto as **Exhibit D** are true and correct copies of excerpts taken from the
3 transcript of David Shen's deposition in this case, volume II, dated September 22, 2023.

4 7. Attached hereto as **Exhibit E** are true and correct copies of excerpts taken from the
5 transcript of Laurence Huen's deposition in this case, volume I, dated November 9, 2023.

6 8. Attached hereto as **Exhibit F** are true and correct copies of excerpts taken from the
7 transcript of Paul Roth's deposition in this case, volume I, dated August 7, 2023.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct.

10 Executed on this 7th day of March, 2025, at Los Angeles, California.

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13 Lawrence J.H. Liu
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